

May 10, 2010

IOWA UTILITIES BOARD

NOI-2008-0003



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May 10, 2010

Judi Cooper, Executive Secretary
Iowa Utilities Board
350 Maple Street
Des Moines, IA 50319-0069

RE: Interstate Power and Light Company
PURPA Standards in the Energy Independence and Security Act of 2007
Docket No. NOI-08-3
Letter in Lieu of Additional Comments – Smart Grid and Aggregation of Retail
Customers

Dear Secretary Cooper:

Pursuant to the Iowa Utilities Board's (Board) Order Allowing Additional Comments issued on April 21, 2010, Interstate Power and Light Company (IPL) submits this letter in lieu of additional comments to indicate to the Board that it has no additional comments regarding the written and oral comments provided by the parties in the above-referenced docket as it relates to smart grid issues, as filed today on EFS. IPL's statements relating to smart grid issues contained in its April 1, 2010, response filed with the Board remain unchanged. IPL appreciates the efforts and consideration of the Board in reviewing smart grid issues and looks forward to continued dialogue.

Aggregation of Retail Customers

IPL does, however, wish to provide additional affirmation of its prior stance regarding the aggregation of retail customers (ARC). IPL appreciates the Board's efforts and consideration in reviewing ARC issues. IPL also commends the Board for ordering a temporary prohibition of ARCs from operating in Iowa, especially given the uncertainty of this issue from a regulatory and legal perspective.

IPL reiterates its opposition to ARC participation with Iowa-attributable interruptible loads in the MISO Demand Response (DR) markets. IPL takes this position because of the potentially negative effects on non-participating customers and unanswered questions when customers, or their (DR) loads, are simultaneously subject to both federal (MISO) and retail (Iowa) regulation. With so many unanswered questions, IPL finds value in a future ARC workshop after June 1, 2010, when it is currently anticipated the Midwest Independent Transmission System Operator, Inc.'s proposed ARC tariffs may be implemented by the Federal Energy Regulatory Commission.

Secretary Judi Cooper

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IPL appreciates the efforts and consideration of the Board regarding this docket, and has nothing further to add to the record.

Very truly yours,

/s/ Paula N. Johnson

Paula N. Johnson

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PNJ/kjf

Enclosure